

10/20/2022 15:58 FAX

001/002

Three Logan Square  
1717 Arch Street, 5th Floor  
Philadelphia, PA 19103  
215.568.2000 tel  
215.568.0140 fax



## FACSIMILE

The Honorable Judge Milton Younge (267) 299-7368

TO FAX NO. PHONE

10/20/2022 4:04 PM 2

DATE No. of Pages (including cover page)

Schrotberger v. Doe, et al., USDC EDPA, Case No. 2:21-CV-00364-JMY

RE

Lorena E. Ahumada (215) 568-0140 (215) 496-7227

FROM FAX NO. PHONE

LORENA E. AHUMADA  
LAHUMADA@KLEINBARD.COM  
*Direct Dial 215.496.7227*



October 20, 2022

**VIA FAX (267-299-7368)**

The Honorable John Milton Younge  
4007 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

RE: Schrotberger v. Doe, et al., USDC EDPA, Case No. 2:21-CV-00364-JMY

Dear Judge Younge;

I write on behalf of plaintiff, Jillian Schrotberger and defendant, SNP Transformations, Inc. in the above-referenced matter. The parties respectfully request a short extension of the deadlines set in the Court's Scheduling Order dated September 9, 2022.

The parties are actively engaging in discovery and mutually agree that the volume of requested documents and the number of anticipated depositions necessitate a two-month extension of the current case deadlines. Jointly, therefore, the parties respectfully request that the Scheduling Order be amended to provide a 2-month extension of deadlines, as follows:

1. All fact discovery shall be completed by **Friday, March 17, 2023**.
2. The parties shall produce their expert report(s) by **Friday, March 31, 2023**; rebuttal expert report(s) shall be produced by **Friday, April 14, 2023**; all expert discovery, including depositions of expert witnesses shall be completed by **Friday, April 28, 2023**.
3. All motions for summary judgment and *Daubert* motions shall be filed no later than **Tuesday, May 30, 2023**. Responses to such motions shall be filed no later than **Friday, June 30, 2023**.

Thank you for your courtesies in this matter.

Respectfully yours,

*B.A.*

Lorena E. Ahumada

cc (via email):

Gregory S. Hyman, Esq.  
Katharine W. Fogarty, Esq.